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*Attorneys for Defendant in Interpleader/
Crossclaimant Fox Rothschild LLP*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

In re

JASON A. IMES,

Plaintiff in Interpleader,

vs.

FOX ROTHSCHILD LLP and the UNITED
STATES OF AMERICA,

Defendants in Interpleader,

FOX ROTHSCHILD LLP,

Crossclaimant,

vs.

the UNITED STATES OF AMERICA,

Crossclaim Defendant.

Case No. 2:23-cv-00518-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND BRIEFING DEADLINE
RELATING TO REASONABLENESS
OF FEES**

(FIRST REQUEST)

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1 Pursuant to Local Rules IA 6-1 and LR 7-1 and 7-2, Cross-Claimant Fox Rothschild LLP
2 (“Fox”), and Crossclaim Defendant the United States of America (“USA”, and together with Fox,
3 the “Parties”), by and through their respective undersigned counsel, stipulate as follows:

4 1. On September 30, 2024, the Court entered its Order (the “Order”) on the Parties’
5 respective motions for summary judgment, in which it granted Fox’s motion for summary
6 judgment and denied the USA’s motion for summary judgment. ECF No. 47.

7 2. The Order required that “both Fox Rothschild, LLP and the United States of
8 America must file supplemental briefs no later than November 15, 2024, if at all, to address the
9 issue of reasonableness, in accordance with the foregoing. Failure to do so will result in judgment
10 being entered.”

11 3. Since the Order was entered, the Parties have engaged in settlement discussions.
12 On November 5, 2024, Fox submitted a written settlement offer to entirely resolve this
13 interpleader matter. This offer by Fox is currently under formal consideration by the Department
14 of Justice (“DOJ”).

15 4. In order to provide sufficient time for the DOJ to consider Fox’s offer, the Parties
16 request a one-month extension of the current briefing deadlines. The Parties stipulate and request
17 the Court’s permission to extend the deadline to file such briefs by approximately one month,
18 until December 16, 2024. In the event a settlement is reached, the Parties will immediately notify
19 the Court and file a stipulation or joint motion fully resolving this interpleader action.

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This Stipulation is not intended to cause delay or prejudice any party.

DATED this 6th day of November, 2024.

DATED this 6th day of November, 2024.

FOX ROTHSCHILD LLP

UNITED STATES OF AMERICA

/s/ Kevin M. Sutehall

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IT IS SO ORDERED


UNITED STATES DISTRICT JUDGE

DATED: November 8, 2024.